M/045/049

Clifton Mining Company

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January 15, 2001

D. Wayne Hedberg
State Of Utah Department of Natural Resources
Division Of Oil, Gas, and Mining
PO. Box 145801
Salt Lake City, UT 84114-5801

Dear Mr. Hedberg,

Most of the questions we have left to answer are from Lynn and have to do with the soils etc. on the mill site. Please see the following information.

106.5

We have stated all along that the area within the mill fence, was void of any visible top soil, due to the 100 years of milling activity and the movement of tailings around on the site over the multitude of years. I do not know where Lynn got the idea that some of the native soil had been saved in the dikes, we have stated all along that the dikes were made up of old tailings and we have showed time and time again that the tailings were non-acid generating and maybe a good fit for a soil substitute, to be used in reclamation. We have taken a **sample** of the dike material and sent it to Utah State University for **soil analysis** to be analyzed for each item on the list. The information on the soil sample should be ready within the next two and a half weeks.

As per your question of volume of material in the dikes alone, the answer is as follows:

Main Tailings Dike - 420 liner feet x six foot avg. height and six foot avg. width = 15,120 sq.ft.

Fresh Water Pond - 120 liner feet x six foot avg. height and six foot avg. width = 4,320 sq.ft.

It is important to note that these figures do not include estimates of volume of material held within the tailings impoundment area and only include the volume of material in the dikes.

106.7

A vegetation survey has been completed directly across (North) from the mill site on the other side of the drainage. Please see additional information and photos.

Baseline Soil And Overburden Information

Request # 1

The order 3 soil survey was requested from the Conservation Service and a Mr. Bill Broderson informed us that he had the entire Tooele County area done and he forwarded a full copy to us. The information is approximately 4 inches thick. We would request that after Lynn gets the information from it that he needs, that he then return the copy to us for future work.

Request # 2

As has already been indicated in the past, there is no top soil in the millsite area to be saved, so it will be impossible to give any volume estimates on non-existent top soil. Mr Munson of your staff has been on site and verified this fact. Milling activity has been ongoing on the site for approximately 100 years. When we gained access to the site in about 1980, the entire site had been disturbed and no topsoil had been saved within the fenced area. We are not contemplating disturbing any additional areas at this time.

Request # 3

A laboratory analysis will be obtained on any additional areas adjacent to the mill that may be disturbed some time in the future.

Other Information

In addition to what has been requested, I have taken an additional soil sample from an undisturbed area of property adjacent to the mill so that information on the natural soil types can be obtained. This additional soil sample is also at Utah State University and the information will be forwarded to the DOGM as soon as it becomes available, they have guesstimated that the information will be available in the next two and a half weeks.

I believe we have addressed all unanswered questions on your last letter, if there are more that we have missed please let me know.

Sincerely,

CLIFTON MINING COMPANY

William D. Moeller, President

WDM/kwm

Clifton Mining Company
Vegetation Survey
Gold Hill Mill Area

The meter square area was split into quarter sections, NE, NW, SE, SW.

NE Section

13% Vegetation (sagebrush)
30% Rock
2 % Litter
55% Bare Ground

NW Section

48% Vegetation (45% sagebrush & 3% grasses)
15% Rock
4 % Litter
33% Bare Ground

SE Section

15% Vegetation (sagebrush)
25% Rock
3 % Litter
57% Bare Ground

SW Section

14% Vegetation (sagebrush)
25% Rock
7 % Litter
54% Bare Ground

Note: Photos were taken and are included herein for verification. There is also additional photos demonstrating the normality of the test site against the adjacent area.